

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CLEAN ENERGY CHOICE COALITION, NFP

Plaintiff,

v.

VILLAGE OF OAK PARK, ILLINOIS,

Defendant.

Case No. 1:25-cv-04353
Hon. Franklin U. Valderrama

**DECLARATION OF PAT CARDONI IN SUPPORT OF PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

I, Pat Cardoni, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have personal knowledge of the following facts, which are true and correct:

1. I am over eighteen years of age and make this declaration based on information personally known to me.

2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently to them.

3. I submit this Declaration in support of Plaintiff Clean Energy Choice Coalition, NFP's Motion for Summary Judgment.

4. I am [City Chapter President BIAGC] at the National Association of Homebuilders ("NAHB"), and have served in that role since 2015.

5. NAHB is a member of Clean Energy Choice Coalition, NFP.

6. With more than 140,000 members, NAHB represents the largest network of craftsman homebuilders in the United States.

7. Each year, NAHB's members construct about 80% of the new homes built in the United States, both single-family and multifamily.

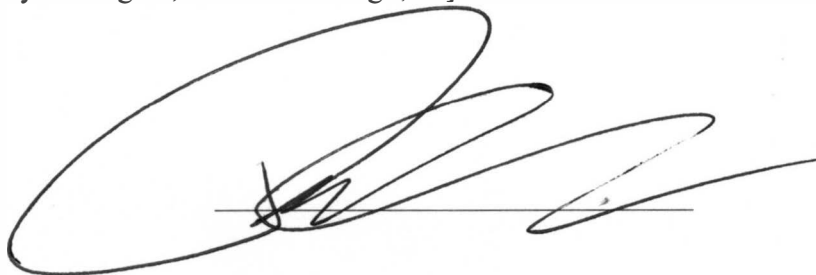
8. The Ordinance has increased construction costs in Oak Park substantially—costs that are ultimately borne by NAHB homebuilders and homebuyers.

9. NAHB has suffered and will continue to suffer serious harms, including increased expenses. Such expenses cannot be recouped, which make NAHB's financial suffering an irreparable harm.

10. Money damages will not adequately remedy the harm already caused by the Ordinance to NAHB, and the harm that the Ordinance will continue to cause.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this 25th day of August, 2025 in Chicago, IL].

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by a series of loops and a long horizontal stroke extending to the right.

Pat Cardoni